REMARKS

Applicant has considered all points made by the Examiner in the Office Action and has responded to same in order to ensure compliance with the applicable rules.

1. **Allowable Matter.**

The examining attorney has determined that claims 1 – 7, 9 and 10 are allowable over the prior art of record.

The examining attorney further determined that claim 23 would be allowable if rewritten to overcome the rejection under 35 USC 112, 2nd paragraph. Applicant has rewritten this claim by amendment above.

The applicant thanks the examining attorney for the allowed claims.

2. **35 U.S.C. 102(a) rejections.**

Claims 11 – 12, 16 – 17, and 20 – 22 stand rejected under 35 U.S.C. §102 as being anticipated by Faber et al. (U.S. Patent No. 6715973). Applicant respectfully traverses and submits that the claims are patentable over Faber.

Anticipation is a factual determination. In order to establish anticipation, it is incumbent upon the examining attorney to identify in a single prior art reference disclosure of **each and every element** of the claims in issue, arranged as in the claim. *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 1458, 221 U.S.P.Q. 481 (Fed. Cir. 1984); *In re Schaumann*, 572 F.2d 312, 197 U.S.P.Q. 5 (C.C.P.A. 1978) (anticipation is measured with respect to the terms of the claims in issue) (emphasis added). When the claimed invention is not identically disclosed in a reference, and instead requires picking and choosing among a number of different options disclosed by the reference, or the inclusion of options not disclosed in the reference, the reference does not anticipate. *Akzo N.V. v. U.S. Int'l Trade Comm'n*, 808 F.2d 1471, 1480, 1 U.S.P.Q.2d 1241, 1245-46 (Fed. Cir. 1986), *cert. denied*, 482 U.S. 909, 107 S.Ct. 2490 (1987). "Although this disclosure requirement presupposes the knowledge of one skilled in the art of the claimed invention, that presumed knowledge does not grant a license to read into the prior art reference teachings that are not there." *Motorola, Inc. v. Interdigital Tech. Corp.*, 121 F.3d 1461, 43 U.S.P.Q.2d 1481, 1490 (Fed. Cir. 1997).

Applicant's claims 11, 21 and 22 (as amended) both disclose rollers that are adapted to removably engage arms. In contrast, the rollers of Faber are not removable. The removability of the rollers from the arms is important as it allows for the replacement of flexible sheet members as it is exhausted through use. Although the rollers may, as the examining attorney indicated, be destroyed to effect their removal, that does not transform their connection to "removably engaged" since, once removed by destruction, they may no longer engage the arms. Therefore, the teaching of removability of the rollers is not in Faber.

Because the removable engagement of the rollers to the arms elements are recited in Applicant's claims 11, 21 and 22 (as amended) but are absent from Faber, the Faber reference cannot anticipate the present invention.

In light of the above, Applicant respectfully submits that claims 11, 21 and 22 (as amended) are not anticipated by the Faber reference. Because claims 12, 16 – 17, and 20 ultimately depend from claim 11 these claims are also not anticipated by the Faber reference. Accordingly, Applicant respectfully requests the examining attorney to withdraw the rejection under 35 U.S.C. § 102(b).

CONCLUSION

For the foregoing reasons, it is submitted that the proposed amendments comply with 37 CFR 1.116 and should therefore be entered, and with their entry that the application is now in condition for allowance. Such action therefore is respectfully requested.

Respectfully submitted,

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CERTIFICATE OF MAILING

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Belen B. Longoria
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